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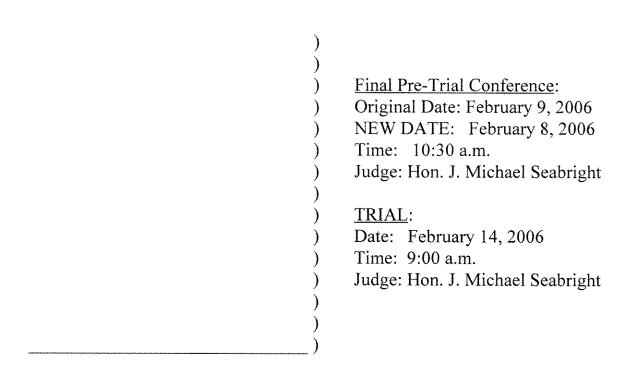
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FILED IN THE UNITED STATES DISTRICT COURT DISTRICT OF HAWAII

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

PACIFIC STOCK, INC.,)	CIVIL NO. CV04-00725 JMS/LEK
)	(Copyright Infringement)
Plaintiff,)	
)	SUPPLEMENTAL DECLARATION
VS.)	OF J. STEPHEN STREET IN
)	SUPPORT OF PLAINTIFF PACIFIC
SOLTUR, INC., a Hawaii)	STOCK, INC.'S MOTION FOR
corporation; GIGI FIORENTINO,)	SANCTIONS AGAINST
individually; LUIS ZANOTTA,)	DEFENDANTS SOLTUR, INC.;
individually,)	GIGI FIORENTINO, Individually;
)	AND LUIS ZANOTTA, Individually
Defendants.)	FOR FAILURE TO RESPOND TO
)	DISCOVERY, FILED FEBRUARY 2,
)	2006; CERTIFICATE OF SERVICE
)	
)	Hearing:
)	Date: Tuesday, March 7, 2006
)	Time: 9:30 a.m.
)	Judge: Hon. Leslie E. Kobayashi



SUPPLEMENTAL DECLARATION OF J. STEPHEN STREET IN SUPPORT OF PLAINTIFF PACIFIC STOCK, INC.'S MOTION FOR SANCTIONS AGAINST DEFENDANTS SOLTUR, INC.; GIGI FIORENTINO, Individually, AND LUIS ZANOTTA, Individually, FOR FAILURE TO RESPOND TO DISCOVERY, FILED FEBRUARY 2, 2006

- I, J. Stephen Street, do hereby declare and state under penalty of perjury as follows:
 - 1. I am an attorney licensed to practice law in the State of Hawaii.
- 2. I am an attorney with the law firm of Rush Moore LLP, A Limited Liability Law Partnership, and am counsel for Plaintiff PACIFIC STOCK. INC. ("Plaintiff") in this matter.

- 3. I have personal knowledge of and am competent to testify to the matters contained in this Declaration in support of Plaintiff's Motion for Sanctions Against Defendants SOLTUR, INC., GIGI FIORENTINO, Individually; and LUIS ZANOTTA, Individually, for failure to respond to discovery, which was filed with the Court on February 2, 2006 ("Motion for Sanctions").
- Later that same day, February 2, 2006, I obtained a new 4. telephone number for Sidney Quintal, Esq. (291-8394), and I left a message for him.
- 5. At approximately 4:50 p.m., Mr. Quintal returned my telephone call.
- 6. I advised Mr. Quintal that pursuant to the Local Rules of Practice for the United States District Court for the District of Hawaii, I was attempting to meet and confer with him concerning the outstanding discovery requests. I asked him whether his clients intend to comply with the outstanding discovery requests. He advised me that he would have to talk to his clients but that he was unable to respond either way at the present time. I requested that he confer with his clients and contact me as soon as possible.

I declare under penalty of law that the foregoing is true and correct to the best of my knowledge.

DATED: Honolulu, Hawaii, February 3, 2006.

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF HAWAII

PACIFIC STOCK, INC.,) CIVIL NO. CV04-00725 JMS/LEK) (Copyright Infringement)
Plaintiff,	
) CERTIFICATE OF SERVICE
VS.)
SOLTUR, INC., a Hawaii corporation; GIGI FIORENTINO, individually; LUIS ZANOTTA, individually,))))
Defendants.)) _)

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing document will be duly served upon the following party by U.S. Mail, addressed to him at his last known addresses, on February 3, 2006:

> SIDNEY M. QUINTAL, ESQ. 1188 Bishop Street, Suite #3301 Honolulu, Hawaii 96813 Attorney for Defendants SOLTUR, INC. GIGI FIORENTINO, and LUIS ZANOTTA

SIDNEY M. QUINTAL, ESQ. 1188 Bishop Street, Suite #3402 Honolulu, Hawaii 96813 Attorney for Defendants SOLTUR, INC. GIGI FIORENTINO, and LUIS ZANOTTA

DATED: Honolulu, Hawaii, February 3, 2006.

J. STEPHEN STREET Attorney for Plaintiff PACIFIC STOCK, INC.